

PRIVACY NOTICE for Ted Wragg Teacher Training Partnership Trainee Information

1. Who we are and the scope of this notice

Ted Wragg Teacher Training Partnership (TWTP) is the Department for Education-accredited provider of Initial Teacher Training and is operated by **Ted Wragg Multi-Academy Trust**. For the accredited-provider functions described in this notice, Ted Wragg Multi-Academy Trust is the data controller and decides why and how that personal information is used.

TWTP delivers training through four regional training partners: South West Teacher Training (SWTT), Exeter Consortium Schools' Alliance (ECSA), Brigshaw Learning Partnership (BLP) and Reach Teacher Training (RTT).

SWTT forms part of Ted Wragg Multi-Academy Trust. ECSA, BLP and RTT are separately governed organisations and are data controllers for personal information they process for their own recruitment, local programme delivery, employment and administration. They may therefore provide you with an additional privacy notice.

This notice applies to all trainees registered with TWTP because TWTP receives and uses trainee information across the partnership to maintain oversight of the curriculum and assessment framework, quality assure provision, meet regulatory requirements and make recommendations for Qualified Teacher Status (QTS). Your local training partner and placement schools will also process information to deliver your training and placements.

Trainees may undertake a QTS-only route or a QTS with PGCE route. Where you follow a PGCE route, the University of Exeter is a separate data controller for the personal information it processes for its own academic and administrative purposes and will provide its own privacy information.

2. How to contact us

Ted Wragg Multi-Academy Trust

Great Moor House, Bittern Road, Sowton Industrial Estate, Exeter, Devon, EX2 7NL

Email: dataprotection@tedwraggtrust.co.uk

Data Protection Officer

Judicium Consulting Limited, 5th Floor, 98 Theobalds Road, London, WC1X 8W8

Email: dataservices@judicium.com

3. The personal information we collect

- Identity and contact information, including your name, previous names, address, date of birth, telephone number, email address, training partner or hub and emergency contacts.
- Application and recruitment information, including your application, personal statement, interview notes, references and recruitment decisions.

- Education, qualification and professional information, including degree details, academic records, qualification evidence, subject knowledge assessments and previous employment or experience.
- Eligibility, vetting and safeguarding information, including identity checks, right to work information, Disclosure and Barring Service (DBS) information, prohibition and other safeguarding checks, and information needed to assess your suitability to train and teach.
- Programme and placement information, including your chosen route, placement allocation, attendance, engagement, training records, mentor records, observations, targets, assessments, assignments, moderation information, progress reviews and recommendations for Qualified Teacher Status (QTS).
- Professional conduct, capability, complaints and investigation information, including concerns, support plans, fitness to train or teach processes, academic or professional misconduct matters, appeals and complaints.
- Financial and employment information, where relevant, including tuition fee, bursary, scholarship, student finance, bank, payroll, tax, National Insurance, salary and employment information for salaried or apprenticeship routes.
- Health, wellbeing and reasonable adjustment information, including occupational health information where required.
- Equality monitoring information, such as age, disability, ethnicity, religion or belief and sex, where collected and by consent.
- Images, audio or video recordings and information created through learning, assessment, communication and online training platforms.
- Technical and usage information, such as usernames, account activity, access logs, device or browser information and audit records generated when you use our systems.

Special category and criminal offence data. Some of the information above is particularly sensitive, including health, disability, ethnicity, religion or belief and safeguarding information. DBS and related vetting information may include criminal offence data. We only use this information where the law permits and where it is necessary for a clearly identified purpose.

4. Where we obtain your information from

We obtain most information directly from you. We may also obtain information from:

- DfE Apply for Teacher Training and other Department for Education or Teaching Regulation Agency systems;
- referees, previous employers and education providers;
- your regional training partner, placement schools, mentors, tutors, assessors and other people involved in delivering or quality assuring your training;
- the University of Exeter where you undertake the PGCE route;
- DBS, identity, right to work, safeguarding and occupational health service providers;
- Student Finance England, the Student Loans Company, bursary or scholarship administrators, payroll providers and apprenticeship organisations, where relevant;
- public authorities, regulators, professional bodies or law enforcement agencies where permitted or required by law; and
- Trust and training systems that create attendance, activity, assessment, communication or audit records.

5. Why we use your information and our lawful bases

We use your information only where we have a lawful basis. The principal purposes and bases are set out below.

Purpose	Examples of use	Lawful basis
Recruitment and admissions	Processing applications, interviews, references, eligibility checks and offers.	Public task; legal obligation; steps before entering a contract where applicable.
Delivering teacher training	Enrolment, curriculum delivery, mentoring, placements, attendance, support, assessment, moderation and QTS recommendations.	Public task; contract where applicable.
Safeguarding and suitability	DBS and safeguarding checks, managing concerns, professional conduct and fitness to train or teach.	Legal obligation; public task.
Regulatory and quality assurance	DfE and Teaching Regulation Agency reporting, Ofsted inspection, audit, monitoring, evaluation and continuous improvement.	Legal obligation; public task.
Funding, fees and employment	Tuition fees, bursaries, scholarships, student finance, apprenticeship funding and payroll for salaried trainees.	Legal obligation; public task; contract where applicable.
Equality, wellbeing and adjustments	Equality monitoring, occupational health, support and reasonable adjustments.	Legal obligation; public task.
Communication and administration	Managing accounts, timetables, events, enquiries, routine correspondence and service administration.	Public task; contract where applicable.
Complaints, appeals and legal matters	Handling concerns, complaints, appeals, investigations, claims and obtaining professional advice.	Legal obligation; public task; legitimate interests where appropriate.
Optional publicity	Using identifiable photographs, case studies or testimonials where participation is genuinely optional.	Consent. You may withdraw consent at any time.

6. Special category and criminal offence information

Where we process special category information, we also identify an additional condition under Article 9 of the UK GDPR and the Data Protection Act 2018. Depending on the purpose, this may include:

- Article 9(2)(b), where processing is necessary for obligations and rights in employment, social security or social protection law;
- Article 9(2)(g), where processing is necessary for reasons of substantial public interest, supported by an appropriate condition in Schedule 1 to the Data Protection Act 2018, for example equality of opportunity or treatment, safeguarding, preventing or detecting unlawful acts, regulatory requirements or protecting the public against dishonesty or malpractice;

- Article 9(2)(h), where health information is processed for occupational health, assessment of working capacity or related health services; or
- Article 9(2)(a), explicit consent, but only where the use is genuinely optional and consent can be withdrawn without disadvantage.

Criminal offence information, including DBS information, is processed only under the control of official authority or where authorised by UK law, including relevant conditions in the Data Protection Act 2018. Access is restricted to those who need it, and detailed DBS information is not retained for longer than permitted.

7. What happens if you do not provide information

Most information requested for recruitment, safeguarding, eligibility, programme delivery, assessment, funding and regulatory reporting is necessary. If you do not provide it, we may be unable to consider your application, enrol you, arrange a placement, provide funding, assess your progress, recommend you for QTS or meet our legal and regulatory responsibilities. We will tell you when information is optional and explain any consequences of not providing it.

8. Who we share information with

We share only the information needed for the relevant purpose. Depending on your route and circumstances, recipients may include:

- placement schools and their staff, including teacher training coordinators and mentors;
- your regional training partner, including SWTT, ECSA, BLP or RTT, and authorised staff involved in recruitment, programme delivery, safeguarding, assessment, quality assurance, funding, complaints or administration;
- Ted Wragg Teacher Training Partnership staff and authorised Ted Wragg Multi-Academy Trust staff involved in accredited-provider oversight, governance, finance, safeguarding, quality assurance, QTS recommendations, complaints or data protection;
- the University of Exeter for trainees undertaking the PGCE route;
- the Department for Education, Teaching Regulation Agency and Ofsted;
- Student Finance England, the Student Loans Company, bursary, scholarship, apprenticeship or funding bodies;
- DBS, identity verification, right to work and occupational health providers;
- payroll, pension, tax and employment service providers for salaried or employed routes;
- software, cloud, IT support, communications, learning, assessment and records management providers acting under contract;
- external moderators, assessors, auditors, professional advisers and insurers;
- local authorities, safeguarding partners, police, courts or other public bodies where required or permitted by law; and
- another training provider or placement organisation where this is necessary to support a transfer, alternative placement or continuation of training.

We do not sell your personal information. Where an organisation processes information on our behalf, it must follow our instructions, protect the information and use it only for the agreed purpose. Other organisations may act as separate controllers for their own statutory, regulatory, academic or employment functions and will be responsible for providing their own privacy information.

9. International transfers

Some suppliers may store or access personal information outside the United Kingdom. Where this occurs, we will ensure that the transfer is lawful and that appropriate safeguards are in place. These may include UK adequacy regulations, the UK International Data Transfer Agreement or the UK Addendum to approved standard contractual clauses, together with any additional safeguards required following a transfer risk assessment. You may contact us for further information about the safeguards used.

10. How we keep your information secure

We use appropriate technical and organisational measures to protect trainee information from accidental or unlawful loss, alteration, disclosure or access. Measures include role-based access, account controls, secure systems, staff training, contractual controls for suppliers, audit arrangements and procedures for managing and reporting personal data breaches. Access is limited to people who need the information for their role.

11. How long we keep your information

We keep personal information only for as long as it is needed for the purpose for which it was collected and to meet legal, safeguarding, funding, audit, employment and regulatory requirements. Different records have different retention periods. These are set out in the Trust Records Retention Schedule and take account of Department for Education, DBS, safeguarding, finance and employment requirements. At the end of the relevant period, information is securely deleted, destroyed or anonymised unless there is a lawful reason to retain it for longer, for example an ongoing safeguarding matter, complaint, legal claim or regulatory investigation.

The Trust's published policies and documents are available at: [Ted Wragg Multi-Academy Trust - Data Protection Policies](#)

12. Automated decision-making

We do not make decisions about admission, progression, professional suitability or the award of QTS solely by automated means where the decision would have a legal or similarly significant effect on you. If this changes, we will provide you with the information required by data protection law, including meaningful information about the logic involved and the likely consequences.

13. Your data protection rights

Depending on the circumstances and the lawful basis used, you may have the right to:

- ask for access to your personal information and receive a copy;
- ask us to correct inaccurate or incomplete information;
- ask us to erase information in certain circumstances;
- ask us to restrict how information is used in certain circumstances;
- object to particular processing, including direct marketing;
- receive information you provided in a portable format where the right to data portability applies;
- withdraw consent at any time where we rely on consent, without affecting earlier lawful processing; and

- ask for human intervention where a significant decision has been made solely by automated means.

These rights are not absolute and may not apply where we have a legal obligation or overriding lawful reason to continue processing. To exercise a right, contact dataprotection@tedwraggtrust.co.uk. We may need to verify your identity before responding. We will not normally charge a fee.

14. How to raise a concern

If you have a concern about how we use your information, please contact the Trust in the first instance at dataprotection@tedwraggtrust.co.uk. You may also contact our Data Protection Officer using the details in section 2.

You have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113

Website: ico.org.uk/make-a-complaint

15. Changes to this notice

We keep this notice under review and may update it when our services, legal obligations or processing arrangements change. Where a change is significant, we will take reasonable steps to bring it to your attention before the new processing begins.